

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
BROWNSVILLE DIVISION**

STATE OF TEXAS, ET AL.,

Plaintiffs,

vs.

Case No. 1:14-cv-254

UNITED STATES OF AMERICA, ET AL.,

Defendants.

PLAINTIFFS' UNOPPOSED MOTION TO EXCEED PAGE LIMITS

Plaintiffs respectfully ask the Court for permission to exceed the page limits in their Reply in Support of Plaintiffs' Motion For Preliminary Injunction. Plaintiffs' motion raises complex issues in a case of national importance, and Plaintiffs need these extra pages to adequately respond to the issues raised in the United States' brief. Plaintiffs also need additional pages to ensure that the brief represents the consolidated views of all 25 plaintiff States. The United States does not oppose this motion.

CONCLUSION

Plaintiffs' motion to exceed the page limit should be granted.

Respectfully submitted.

LUTHER STRANGE
Attorney General of Alabama

MARK BRNOVICH
Attorney General of Arizona

DUSTIN MCDANIEL
Attorney General of Arkansas

PAMELA JO BONDI
Attorney General of Florida

SAMUEL S. OLENS
Attorney General of Georgia

LAWRENCE G. WASDEN
Attorney General of Idaho

JOSEPH C. CHAPELLE
PETER J. RUSTHOVEN
Counsel for the State of Indiana

DEREK SCHMIDT
Attorney General of Kansas

JAMES D. "BUDDY" CALDWELL
Attorney General of Louisiana

TIMOTHY C. FOX
Attorney General of Montana

JON C. BRUNING
Attorney General of Nebraska

WAYNE STENEHJEM
Attorney General of North Dakota

MICHAEL DEWINE
Attorney General of Ohio
ERIC E. MURPHY
Co-counsel for the State of Ohio

KEN PAXTON
Attorney General of Texas

CHARLES E. ROY
First Assistant Attorney General

JAMES D. BLACKLOCK

/s/ Andrew S. Oldham
ANDREW S. OLDHAM
Deputy Solicitor General
Attorney-in-Charge
State Bar No. 24081616

J. CAMPBELL BARKER
Deputy Solicitor General

ARTHUR C. D'ANDREA
Assistant Solicitor General

ANGELA V. COLMENERO
ADAM N. BITTER
Assistant Attorneys General

Office of the Attorney General of Texas
P.O. Box 78711
Austin, Texas 78711-2548
512-936-1700

(additional counsel on following page)

E. SCOTT PRUITT
Attorney General of Oklahoma

ALAN WILSON
Attorney General of South Carolina

MARTY J. JACKLEY
Attorney General of South Dakota

SEAN D. REYES
Attorney General of Utah

PATRICK MORRISEY
Attorney General of West Virginia

BRAD D. SCHIMEL
Attorney General of Wisconsin

BILL SCHUETTE
*Attorney General for the People of
Michigan*

DREW SNYDER
Counsel for the Governor of Mississippi

PAUL R. LEPAGE
Governor of Maine

ROBERT C. STEPHENS
*Counsel for the Governor of North
Carolina*

TOM C. PERRY
CALLY YOUNGER
Counsel for the Governor of Idaho

CERTIFICATE OF CONFERENCE

I certify that my colleague, Arthur C. D'Andrea, conferred with counsel for the Defendants, and they do not oppose this motion.

____/s/ Andrew S. Oldham_____
Andrew S. Oldham

CERTIFICATE OF SERVICE

I certify that I served a copy of this motion on the following counsel for the Defendants via CM/ECF:

Adam D. Kirschner
Kyle D. Freeny
Trial Attorney
U.S. Department of Justice
Civil Division, Federal Programs Branch
20 Massachusetts Ave., NW, Room 7126
Washington D.C. 20001

Daniel David Hu
U.S. Attorney's Office
1000 Louisiana, Suite 2300
Houston, Texas 77002

Counsel for Defendants

____/s/ Andrew S. Oldham_____
Andrew S. Oldham